

THOMAS E. FRANKOVICH (State Bar No. 074414)

THOMAS E. FRANKOVICH,

A PROFESSIONAL LAW CORPORATION

1832-A Capitol Street

Vallejo, CA 94590

Telephone: (415) 444-5800

Facsimile: (415) 674-9900

Attorney for Plaintiff

IRMA RAMIREZ

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

IRMA RAMIREZ,

Plaintiff,

v.

YUCATASIA; *et al.*,

Defendants.

CASE NO.: 15-CV-01547-EMC

**STIPULATION and ~~[PROPOSED]~~
ORDER TO CONTINUE THE
FURTHER CASE MANAGEMENT
CONFERENCE**

The parties by and through their respective attorney of record stipulate to continue the Further Case Management Conference currently set for June 23, 2016 at 10:30 a.m. for the following reasons:

1. **Whereas**, the parties have reached a settlement and are currently finalizing the settlement agreement;
2. **Whereas**, on June 10, 2016, defendants sent over their changes to the settlement agreement;

STIPULATION and ~~[PROPOSED]~~ ORDER TO CONTINUE CASE MANAGEMENT CONFERENCE

3. **Whereas**, plaintiff's counsel has been on vacation and has not had an opportunity to review defendants' changes to the settlement agreement.

4. **Therefore**, the parties respectfully request that the Further Case Management Conference currently scheduled for June 23, 2016 at 10:30 a.m. be continued to either July 25, 2016 at 10:30 a.m., September 1, 2016 at 10:30 a.m., and or a date convenient to the Court.

IT IS SO STIPULATED.

Dated: June 15, 2016

Respectfully submitted,
THOMAS E. FRANKOVICH,
A PROFESSIONAL LAW CORPORATION

By: /s/Thomas E. Frankovich
Thomas E. Frankovich
Attorney for Plaintiff

Dated: June 15, 2016

LEPERA + ASSOCIATES, PC

By: /s/ Joseph A. Lepera
Joseph A. Lepera
Attorneys for Defendants
PHUONG DUONG dba YUCATASIA
sued as DUONG PHUONG)

(erroneously

Dated: June 15, 2016

LAW OFFICES OF JOSEPH A. SACRAMENTO

By: /s/ David John Foran
David J. Foran
Attorneys for Defendants Lorraine T.C. Dun,
Trustee of the Lorraine T.C. Dun Survivor's Trust;
and Trustee of the Edmund Y.K. Dun Bypass Trust

[~~PROPOSED~~] ORDER

IT IS SO ORDERED that the Case Management Conference set for June 23, 2016 at 10:30 a.m. is continued to August 4, 2016, at 10:30 a.m./ ~~p.m.~~ The parties shall file a Joint Case Management Statement no later than seven (7) days prior to the Conference.

June 16
Dated: _____, 2016

